

Defendant's employment practices and policies, and Defendant's electronic communications related to the Plaintiff from 1 month prior to her report to Human Resources until the end of her employment with Defendant.

- (b) The discovery period will begin on the date of the Court's Scheduling Order. All discovery will be served in order to allow answers to the discovery requests to be served by the completion of the discovery period on February 28, 2019.
- (c) The maximum number of interrogatories by each party to another party will be 30, and answers will be due 30 days after service of the interrogatories.
- (d) The maximum number of requests for admission will be 30, and the responses will be due 30 days after service of the requests.
- (e) The maximum number of depositions by each party will be 6.
- (f) The parties were unable to agree to a time limit on depositions.
 - (1) The Plaintiff proposes that depositions be limited to 7 hours each.
 - (2) The Defendant proposes that depositions be limited to 4 hours each.
- (g) The deadline for exchanging reports of expert witnesses will be December 31, 2018.
- (h) Supplementations under Rule 26(e) will be due 30 days before the date for trial.
- (i) No issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced, are anticipated.
- (j) No issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under

Federal Rule of Evidence 502, are anticipated.

4. Other Items:

- (a) The parties do not request a meeting with the court before a scheduling order is issued.
- (b) The parties request a pretrial conference at least two weeks prior to the date for trial.
- (c) Plaintiff shall seek to amend pleadings or join additional parties no later than January 15, 2019.
- (d) The defendant shall seek to amend pleadings or to join parties no later than January 31, 2019.
- (e) The final date to file dispositive motions shall be March 30, 2019.
- (f) The parties believe there might be an opportunity to settle the case.
- (g) Although the case is not required to be mediated pursuant to Local Civil Rule 101.1a (b), the parties agree that mediation might enhance the settlement prospects of the case. If mediation occurs, it must happen by February 28, 2019. The mediator must be a North Carolina certified mediator. The parties agree to select a mediator by September 30, 2018.
- (h) The final date for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists is 30 days before trial.
- (i) The final date to file objections under Rule 26(a)(3) is 16 days before trial.
- (j) The parties request that the court rule on any motions for summary judgment prior to any trial setting. The parties would request that the court set the trial date no

earlier than 60 days after a ruling on any motions for summary judgment.

This the 25th day of July, 2018

JOSHUA H. STEIN
ATTORNEY GENERAL

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CERTIFICATE OF FILING AND SERVICE

This is to certify that the undersigned has this day electronically filed the foregoing DEFENDANT'S REPORT OF THE PARTIES' PLANNING MEETING with the Clerk of Court using the CM/ECF system, and to further certify that the undersigned served the following non-CM/ECF participant by depositing a copy of same with the United States Postal Service, first-class postage prepaid, and addressed as follows:

Rosita Sabrosso-Rennick
3802 Delverne Rd.
Baltimore, MD 21218

This the 25th day of July, 2018.

/s/ Joseph A. Newsome
Special Deputy Attorney General